

# **EXHIBIT A**

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9 | Attorneys for Plaintiffs

IN THE FIFTH JUDICIAL DISTRICT COURT  
IN AND FOR THE COUNTY OF NYE, STATE OF NEVADA

14 IGNACIO GONZALES ORTIZ, an individual;  
and ADELINA CHAPARRO, an individual,

Plaintiffs,

17 DAVID JOHN LYNCH, an individual;  
18 SYSTEM TRANSPORT, INC., a foreign  
corporation; DOE INDIVIDUALS  
19 I through X; and ROE ENTITIES  
I through X, Inclusive,

#### **Defendants.**

Case No.: CV 21-0743  
Dept. No.: 1

**COMPLAINT  
AND  
DEMAND FOR JURY TRIAL**

**EXEMPTION FROM  
ARBITRATION REQUESTED –  
AMOUNT IN CONTROVERSY IN  
EXCESS OF \$50,000**

24 Plaintiffs IGNACIO GONZALES ORTIZ and ADELINA CHAPARRO, by and through  
25 their attorneys Michael S. Valiente, Esq., Timothy A. Mott, Esq., and James A. Trummell, Esq.  
26 of the law firm VALIENTE MOTT LTD., for their causes of action against Defendant DAVID  
27 JOHN LYNCH, individually, and Defendant SYSTEM TRANSPORT, INC., and each of them,  
28 complains and alleges as follows:

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## **PARTIES AND JURISDICTION**

2           1. Plaintiff IGNACIO GONZALES ORTIZ (“Plaintiff ORTIZ”), at all times herein  
3 mentioned, is and was a resident of Nye County, State of Nevada.

4           2. Plaintiff ADELINA CHAPARRO ("Plaintiff CHAPARRO"), at all times herein  
5 mentioned, is and was a resident of Esmeralda County, State of Nevada. (Plaintiffs ORTIZ and  
6 CHAPARRO collectively referred to hereinafter as "Plaintiffs").

7       3. Upon information and belief, at the time of the incident on December 20, 2019,  
8 and at all times relevant thereto, Defendant DAVID JOHN LYNCH ("Defendant LYNCH") is  
9 and was a resident of San Diego County, State of California.

10       4. Upon information and belief, at the time of the incident on December 20, 2019,  
11 and at all times relevant thereto, Defendant SYSTEM TRANSPORT, INC. ("SYSTEM  
12 TRANSPORT") was a foreign corporation, authorized to conduct and do business in Spokane  
13 County, State of Washington. Defendants LYNCH and SYSTEM TRANSPORT collectively  
14 referred to hereinafter as "Defendants")

15       5. Pursuant to NRCP 10(d) and *Costello v. Casler*, 127 Nev. 437, (2011), the  
16 identity of resident and non-resident defendants designated herein as DOE INDIVIDUALS I  
17 through X, and ROE ENTITIES I through X, inclusive, in their true capacities, whether  
18 individual, corporate, associate or otherwise of the Defendants named herein are unknown to  
19 Plaintiff who, therefore, sue said Defendants by said fictitious names. Plaintiffs are informed  
20 and believe and thereon allege that each of the Defendants designated as DOE INDIVIDUALS  
21 I through X and/or ROE ENTITIES I through X are responsible in some manner for the events  
22 and happenings referred to herein and caused damages proximately to Plaintiffs as herein  
23 alleged. To the extent Plaintiffs did not name a correct entity, Plaintiffs will move to amend  
24 this Complaint to insert the true names and capacities of DOE INDIVIDUALS I through X and  
25 ROE ENTITIES I through X when the same have been ascertained and to join such  
26 Defendants in this action.

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6. Plaintiffs are informed and believe, and thereon allege, that at all relevant times mentioned herein, named Defendants, DOES and ROES, and each of them, were the owner, partner, servant, officer, agent, employer and/or employee of the other, and each of them, and were at all relevant times acting within the scope and performance of said partnership, agency, master/servant, and employment relationship and with the knowledge and consent of the remaining Defendants at the time of the event leading to Plaintiffs' injury.

7. Exercise of jurisdiction by this Court in this action is appropriate because Plaintiffs resided in Nevada, continue to reside in Nevada, the tortious conduct occurred in Nevada, and the amount in controversy is in excess of \$15,000.00.

10       8.     Venue is proper in the Fifth Judicial District Court, Nye County, State of Nevada,  
11 as the Plaintiffs are domiciled in Nye County, Nevada and the tort occurred in Nye County,  
12 Nevada.

## **GENERAL FACTUAL ALLEGATIONS**

14           9. Plaintiffs incorporate and reallege the preceding paragraphs as though fully set  
15 forth herein.

16       10. Upon information and belief, on December 20, 2019 and at all times relevant  
17 hereto, Defendant SYSTEM TRANSPORT was a commercial flatbed trucking company which  
18 had ownership, possession, custody, or control over the semi-truck tractor and/or trailer that was  
19 involved in the motor vehicle collision with is the subject of this complaint.

20       11. Upon information and belief, on December 20, 2019 and at all times relevant  
21 hereto, Defendant SYSTEM TRANSPORT employed, contracted with, or otherwise authorized  
22 agency through Defendant LYNCH to transport large freight on behalf of Defendant SYSTEM  
23 TRANSPORT.

24       12. Upon information and belief, on December 20, 2019 at all times relevant hereto,  
25 Defendant LYNCH was an employee and/or agent and/or contractor and/or representative of  
26 Defendant SYSTEM TRANSPORT.

27       13. Upon information and belief, the December 20, 2019, motor vehicle collision,  
28 which is the basis for this Complaint, occurred in Nye County, State of Nevada.

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1       14. On or about December 20, 2019, at 11:49 am Plaintiffs were severely injured in a  
2 motor vehicle collision that occurred on State Route 376 ("SR376") near mile marker 46.

3       15. On the date and time of the collision, Plaintiff ORTIZ was driving a 2007  
4 Chevrolet Colorado ("Plaintiffs' Vehicle") and Defendant LYNCH was operating and driving a  
5 2004 Peterbilt Semi-Truck with an attached flat-bed trailer.

6       16. Upon information and belief, Defendant SYSTEM TRANSPORT owned the 2004  
7 Peterbilt Truck with an attached flat-bed trailer that Defendant LYNCH was operating at the time  
8 of the collision ("Defendants' Vehicle").

9       17. On the date and time of the collision, Plaintiff ORTIZ was travelling northbound  
10 on SR376 toward Round Mountain, Nevada.

11       18. On the date and time of the collision, Defendants were, also, travelling  
12 northbound on SR376 behind Plaintiffs' Vehicle.

13       19. Prior to the subject collision, Plaintiffs' vehicle had slowed down in preparation to  
14 make a lawful left turn.

15       20. Defendant LYNCH failed to use due care and crashed the front end of  
16 Defendants' Vehicle into the right, rear-end of Plaintiffs' Vehicle causing significant impact and  
17 property damage.

18       21. All of the foregoing paragraphs shall be hereafter referred to as the "subject  
19 incident".

20       22. Upon information and belief, at all times relevant hereto, Defendant LYNCH was  
21 driving Defendants' Vehicle within the course and scope of his employment/agency with  
22 Defendant SYSTEM TRANSPORT.

23       23. Upon information and belief, at the time of the subject incident, Defendant  
24 LYNCH had permission, authority, and/or consent, whether express or implied, from Defendant  
25 SYSTEM TRANSPORT to operate Defendants' vehicle during the time the subject incident  
26 occurred.

27       24. That, pursuant to NRS 41.130, Defendant SYSTEM TRANSPORT is vicariously  
28 liable for the damages caused by their employee/agent's actions and negligence.

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1       25. As a result of the subject incident, Plaintiffs sustained significant injuries and  
2 impairments.

3       26. That as a direct and proximate result of the negligence of Defendants, and each  
4 of them, a traffic collision occurred and Plaintiffs sustained personal injuries, all or some of  
5 which conditions may be permanent and disabling, and is entitled to recover damages for the  
6 pain, suffering, anxiety, disability, emotional distress, physical injuries and medical treatment,  
7 both past and future, relating to his injuries, all of which are damages recoverable, in an amount  
8 in excess of Fifteen Thousand Dollars (\$15,000.00).

9       27. That as a direct and proximate result of the negligence of Defendants, and each of  
10 them, Plaintiffs received medical care and other treatment for the aforementioned injuries, and  
11 has incurred expenses for medical care and treatment and expenses incidental thereto, all to  
12 Plaintiffs' damages, the present amount of which is unknown. Such expenses will continue to  
13 accrue in the future, all to Plaintiffs' damages in a presently unascertainable amount. In this  
14 regard, Plaintiffs pray for leave of the Court to insert all said damages herein when the same  
15 have been fully ascertained.

16       28. That as a direct and proximate result of the negligence of Defendants, and each  
17 of them, Plaintiffs have suffered physical impairment, mental anguish, and loss of enjoyment of  
18 life, all of which are damages recoverable by Plaintiffs, in a presently unascertainable amount.

19       29. That as a direct and proximate result of the aforementioned negligence of  
20 Defendants, and each of them, Plaintiffs have sustained a loss of earning capacity, past and  
21 future, as well as a loss of wages.

22       30. That as a further direct and proximate result, Plaintiffs have suffered a loss of  
23 past and future household services in an amount to be proven at trial.

24       31. That as a direct and proximate result of the aforementioned negligence of  
25 Defendants, and each of them, Plaintiffs have been required to engage the services of an  
26 attorney, incurring attorney's fees and costs to bring this action.

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**FIRST CAUSE OF ACTION**  
(Negligence – Against All Defendants)

3           32. Plaintiffs incorporate and reallege the preceding paragraphs as though fully set  
4 forth herein.

5       33. Plaintiff ORTIZ allege that at all relevant times, including at the time of impact,  
6 he was acting reasonably and acting lawfully as the driver of his vehicle.

7       34. Plaintiffs allege that at all times mentioned herein Defendant LYNCH was the  
8 driver of the Defendants' Vehicle that caused the motor vehicle collision resulting in Plaintiffs'  
9 injuries.

10       35. Plaintiffs allege that at all times mentioned herein Defendant LYNCH owed a  
11 duty of care to Plaintiffs to operate, drive, control, service and maintain Defendants' Vehicle in a  
12 reasonably safe manner.

13       36. Plaintiffs allege that, at the time of the subject incident, Defendant LYNCH  
14 breached his duty of care owed to Plaintiffs by negligently and carelessly operating his vehicle in  
15 an unsafe manner causing his vehicle to collide into the rear-end of Plaintiffs' vehicle, which  
16 resulted in Plaintiffs' injuries.

17       37. Plaintiffs allege that, at all times mentioned herein, Defendant SYSTEM  
18 TRANSPORT owed a duty of care to Plaintiffs to operate, drive, maintain, and control the  
19 subject vehicle in a reasonably safe manner.

20       38. Plaintiffs allege that, at all times mentioned herein, Defendant SYSTEM  
21 TRANSPORT breached its duty of care owed to Plaintiffs by allowing the negligent and  
22 careless operation, driving, maintenance, and/or control or Defendants' vehicle in an unsafe  
23 manner causing it to collide into the rear-end of Plaintiffs' vehicle.

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1       39. Plaintiff alleges that, at all times mentioned herein, Defendants, and each of them,  
2 owed a duty of care to Plaintiffs to operate, drive, maintain, service, and control their vehicle in a  
3 reasonably safe manner.

4       40. Plaintiff alleges that, at all times mentioned herein, Defendants, and each of them,  
5 breached their duty of care by operating, driving, maintaining, servicing, and/or controlling their  
6 vehicle in an unreasonable and unsafe manner.

7       41. Plaintiffs alleges that, at all times mentioned herein, because of Defendants, and  
8 each of their, negligence and careless operation of the subject vehicle, Plaintiffs sustained severe  
9 and debilitating injuries.

10      42. Plaintiffs allege that, at the time of the subject incident, Defendant LYNCH was  
11 operating Defendants' Vehicle in a reckless and dangerous manner and in conscious disregard  
12 for the rights and safety of foreseeable motorists and passengers such as Plaintiffs and is thereby  
13 liable for punitive damages.

14      43. Plaintiffs allege that, at the time of the subject incident, Defendant LYNCH was  
15 functioning within the course and scope of his employment with Defendant SYSTEM  
16 TRANSPORT and, as a result, Defendant SYSTEM TRANSPORT is vicariously liable for  
17 Defendant LYNCH's negligence pursuant to the doctrine of respondeat superior  
18 liability. Plaintiffs are informed and believe, and thereon allege that, at the time of the subject  
19 incident, Defendant LYNCH was operating Defendants' vehicle as an agent of Defendant  
20 SYSTEM TRANSPORT with their authority, permission, knowledge, and consent, whether  
21 implied or express, and, as a result, Defendant SYSTEM TRANSPORT is vicariously liable for  
22 Defendant LYNCH's negligence pursuant to the doctrine of respondeat superior liability.

23      44. Plaintiffs are informed and believe, and thereon allege, that Defendant LYNCH  
24 violated NRS 484B.603 for failure to use due care while operating Defendants' Vehicle, and  
25 caused harm to the class of persons that the statute was intended to protect, and the injuries  
26 suffered were of the type, the statute was intended to prevent; as such, Defendant LYNCH is  
27 negligent per se.

28      ///

1       45. That, as a direct and proximate result of the negligence of Defendants, and each of  
2 them, a traffic collision occurred and Plaintiffs sustained personal injuries, all or some of which  
3 conditions may be permanent and disabling. As such, Plaintiffs are entitled to recover damages  
4 for the pain, suffering, anxiety, disability, emotional distress, physical injuries, and medical  
5 treatment, both past and future, relating to his injuries, all of which are damages recoverable, in  
6 an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

7       46. That as a direct and proximate result of the negligence of Defendants, and each of  
8 them, Plaintiffs received medical care and other treatment for the aforementioned injuries, and  
9 has incurred expenses for medical care and treatment and expenses incidental thereto, all to  
10 Plaintiffs' damages, the present amount of which is unknown. Such expenses will continue to  
11 accrue in the future, all to Plaintiffs' damages in a presently unascertainable amount. In this  
12 regard, Plaintiffs prays for leave of the Court to insert all said damages herein when the same  
13 have been fully ascertained.

14       47. That as a direct and proximate result of the negligence of Defendants, and each of  
15 them, Plaintiffs suffered physical impairment, mental anguish, and loss of enjoyment of life, all  
16 of which are damages recoverable by Plaintiffs, in a presently unascertainable amount.

17       48. That as a direct and proximate result of the aforementioned negligence of  
18 Defendants, and each of them, Plaintiffs have sustained a loss of earning capacity, past and  
19 future, as well as a loss of wages.

20       49. That as a further direct and proximate result, Plaintiffs have suffered a loss of past  
21 and future household services in an amount to be proven at trial.

22       50. That as a direct and proximate result of the aforementioned negligence of  
23 Defendants, and each of them, Plaintiffs have been required to engage the services of an  
24 attorney, incurring attorney's fees and costs to bring this action.

## **SECOND CAUSE OF ACTION**

**(Negligent Entrustment – Against Defendant SYSTEM TRANSPORT, INC.)**

27       51. Plaintiffs incorporate and reallege the preceding paragraphs as though fully set  
28 forth herein.

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1       52. Plaintiffs are informed and believe, and thereon allege, that Defendants SYSTEM  
2 TRANSPORT, and DOES I through X and ROES I through X, inclusive, entrusted Defendants'  
3 vehicle to Defendant LYNCH who was operating the subject vehicle at the time of the subject  
4 incident that gives rise to this lawsuit.

5       53. Plaintiffs are informed and believe, and thereon allege that, at the time of the  
6 subject incident, Defendant SYSTEM TRANSPORT entrusted Defendant LYNCH to operate  
7 Defendants' vehicle as an agent of Defendant SYSTEM TRANSPORT with their authority,  
8 permission, knowledge, and consent, whether implied or express, and, as a result, Defendant  
9 SYSTEM TRANSPORT is vicariously liable for Defendant LYNCH's negligence pursuant to  
10 the doctrine of respondeat superior liability.

11      54. Plaintiffs are informed and believe, and thereon allege, that at all times mentioned  
12 herein, Defendant SYSTEM TRANSPORT had a duty to entrust, service, and maintain  
13 Defendants' Vehicle in a reasonably safe manner.

14      55. Plaintiffs are informed and believe, and thereon allege, Defendants SYSTEM  
15 TRANSPORT, and DOES I through X, inclusive, knew or should have known that Defendant  
16 LYNCH was unfit and incompetent to drive Defendants' vehicle at the time of the subject  
17 incident.

18      56. Plaintiffs are informed and believe, and thereon allege, that Defendant SYSTEM  
19 TRANSPORT knew or should have known that entrusting Defendant LYNCH to operate  
20 Defendants' vehicle would create an unreasonable risk of harm to others and led to Plaintiffs'  
21 injuries and related damages.

22      57. Plaintiffs are informed and believe, and thereon allege, that Defendants SYSTEM  
23 TRANSPORT, and DOES I through X, inclusive, had the ability and duty to supervise and  
24 control the conduct of Defendant LYNCH, but failed to do so and allowed the "unfit" driver to  
25 operate Defendant's vehicle.

26      58. Plaintiffs are informed and believe, and thereon allege, that Defendants SYSTEM  
27 TRANSPORT, and DOES I through X, inclusive, were negligent because they failed to exercise  
28 reasonable care to prevent Defendant LYNCH's foreseeable negligent and reckless conduct.

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1       59. Plaintiffs allege that, at the time of the subject incident, Defendant SYSTEM  
2 TRANSPORT knew or should have known that Defendant LYNCH was unfit and incompetent  
3 to drive Defendants' vehicle and conscious disregarded their duty to prevent incompetent and  
4 unfit drivers, such as Defendant LYNCH, from operating commercial vehicles thereby  
5 compromising the rights and safety of foreseeable motorists and passengers such as Plaintiffs.  
6 Accordingly, Defendant SYSTEM TRANSPORT is liable for punitive damages.

7       60. Plaintiffs are further informed and believe, and thereon allege, that Defendants  
8 SYSTEM TRANSPORT and DOES I through X, inclusive, were agents, servants, employees,  
9 successors in interest, and/or joint venturers of their co-defendants, and were, as such, acting  
10 within the course, scope, and authority of said agency, employment and/or venture, and that each  
11 and every defendant, as aforesaid, when acting as a principal, was negligent in the selection of  
12 each and every other defendant as an agent, servant, employee, successor in interest, and/or joint  
13 venturer.

14       61. Plaintiffs are further informed and believe, and thereon allege, that the  
15 aforementioned negligent entrustment of the SUBJECT VEHICLE by Defendants SYSTEM  
16 TRANSPORT, and DOES I through X, inclusive, directly, and proximately caused or  
17 contributed to causing the subject incident and, thereby, directly, legally, and proximately caused  
18 the injuries and damages to Plaintiffs as complained of herein.

19       62. As a legal, direct, and proximate result of the reckless, and negligent conduct of  
20 Defendants SYSTEM TRANSPORT, and DOES I through X, inclusive, Plaintiffs have sustained  
21 damages resulting from physical injuries, mental anguish, and anxiety all to his general damages  
22 in a sum in excess of the jurisdictional limits of this Court.

23       63. That, as a direct result of the negligence of  
24 Defendants, and each of them, a traffic collision occurred and Plaintiffs sustained personal  
25 injuries, all or some of which conditions may be permanent and disabling. As such, Plaintiffs are  
26 entitled to recover damages for the pain, suffering, anxiety, disability, emotional distress,  
27 physical injuries, and medical treatment, both past and future, relating to his injuries, all of which  
28 are damages recoverable, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

1       64. That as a direct and proximate result of the negligence of Defendants, and each of  
2 them, Plaintiffs received medical care and other treatment for the aforementioned injuries, and  
3 has incurred expenses for medical care and treatment and expenses incidental thereto, all to  
4 Plaintiffs' damages, the present amount of which is unknown. Such expenses will continue to  
5 accrue in the future, all to Plaintiffs' damages in a presently unascertainable amount. In this  
6 regard, Plaintiffs pray for leave of the Court to insert all said damages herein when the same  
7 have been fully ascertained.

8       65. That as a direct and proximate result of the negligence of Defendants, and each of  
9 them, Plaintiffs received medical care and other treatment for the aforementioned injuries, and  
10 that said services, care, and treatment is continuing and shall continue in the future, all to his  
11 damages.

12       66. That as a direct and proximate result of the negligence of Defendants, and each of  
13 them, Plaintiffs suffered physical impairment, mental anguish, and loss of enjoyment of life, all  
14 of which are damages recoverable by Plaintiffs, in a presently unascertainable amount.

15       67. That as a direct and proximate result of the aforementioned negligence of  
16 Defendants, and each of them, Plaintiffs have sustained a loss of earning capacity, past and  
17 future, as well as a loss of wages.

18       68. That as a further direct and proximate result, Plaintiffs have suffered a loss of past  
19 and future household services in an amount to be proven at trial

20       69. That as a direct and proximate result of the aforementioned negligence of  
21 Defendants, and each of them, Plaintiffs have been required to engage the services of an  
22 attorney, incurring attorney's fees and costs to bring this action.

### **THIRD CAUSE OF ACTION**

**(Negligent Hiring, Training, Supervision and Retention –  
Against Defendant SYSTEM TRANSPORT, INC.)**

25           70. Plaintiffs incorporate and reallege the preceding paragraphs as though fully set  
26 forth herein.

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1       71. Plaintiffs allege that Defendant SYSTEM TRANSPORT, had a duty to exercise  
2 due care in its dealings with Plaintiffs and in the selection, hiring, training, supervision,  
3 oversight, direction, retention, and control of its employees and/or agents.

4       72. Plaintiffs allege that Defendant SYSTEM TRANSPORT, breached that duty by  
5 selecting, hiring, training, supervising, retaining, and controlling Defendant LYNCH, even  
6 though Defendant SYSTEM TRANSPORT, knew or should have known that Defendant  
7 LYNCH was unfit, incompetent, inexperienced, or insufficiently trained to operate Defendants'  
8 Vehicle on the date and time of the subject collision.

9       73. Plaintiffs allege that Defendant SYSTEM TRANSPORT's breach of duty was a  
10 legal cause of Plaintiffs' injuries and that Plaintiffs suffered damages as a result thereof.

11       74. That, as a direct and proximate result of the negligence of Defendants, and each of  
12 them, Plaintiffs sustained personal injuries, all or some of which conditions may be permanent  
13 and disabling. As such, Plaintiffs are entitled to recover damages for the pain, suffering, anxiety,  
14 disability, emotional distress, physical injuries, and medical treatment, both past and future,  
15 relating to his injuries, all of which are damages recoverable, in an amount in excess of Fifteen  
16 Thousand Dollars (\$15,000.00).

17       75. That as a direct and proximate result of the negligence of Defendants, and each of  
18 them, Plaintiffs received medical care and other treatment for the aforementioned injuries, and  
19 has incurred expenses for medical care and treatment and expenses incidental thereto, all to  
20 Plaintiffs' damages, the present amount of which is unknown. Such expenses will continue to  
21 accrue in the future, all to Plaintiffs' damages in a presently unascertainable amount. In this  
22 regard, Plaintiffs pray for leave of the Court to insert all said damages herein when the same  
23 have been fully ascertained.

24       76. That as a direct and proximate result of the negligence of Defendants, and each of  
25 them, Plaintiffs received medical care and other treatment for the aforementioned injuries, and  
26 that said services, care, and treatment is continuing and shall continue in the future, all to his  
27 damages.

28       ///

77. That as a direct and proximate result of the negligence of Defendants, and each of them, Plaintiffs suffered physical impairment, mental anguish, and loss of enjoyment of life, all of which are damages recoverable by Plaintiffs, in a presently unascertainable amount.

78. That as a direct and proximate result of the aforementioned negligence of Defendants, and each of them, Plaintiffs have sustained a loss of earning capacity, past and future, as well as a loss of wages.

79. That as a further direct and proximate result, Plaintiffs have suffered a loss of past and future household services in an amount to be proven at trial

9       80. That as a direct and proximate result of the aforementioned negligence of  
10 Defendants, and each of them, Plaintiffs have been required to engage the services of an  
11 attorney, incurring attorney's fees and costs to bring this action.

## PRAYER FOR RELIEF

13 WHEREFORE Plaintiffs pray for judgment against Defendants, and each of them, as  
14 follows:

1. For general damages in an amount in excess of \$15,000.00;
  2. For special damages in an amount in excess of \$15,000.00;
  3. Medical and incidental expenses incurred and to be incurred;
  4. Damages for past and future pain, suffering, mental anguish, and loss of enjoyment of life;
  5. Damages for loss of past and future household services;
  6. Damages for loss of past and future earning capacity and lost wages;
  7. For punitive damages in the amount to be determined at trial;
  8. For an award of attorney's fees, costs of suit, and interest incurred; and

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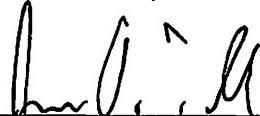
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1           9. For such other and further relief as the Court may deem just and  
2           proper.  
3

4           Dated this 7<sup>th</sup> day of December 2021.

5           VALIENTE MOTT, LTD.  
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7             
8           JAMES A. TRUMMELL, ESQ.  
9           Nevada Bar No. 14127  
10          MICHAEL S. VALIENTE, ESQ.  
11          Nevada Bar No. 14293  
12          TIMOTHY A. MOTT, ESQ.  
13          Nevada Bar No. 12828  
14          7785 W. Sahara Ave. #102  
15          Las Vegas, Nevada 89117

16          *Attorneys for Plaintiffs*

17          VALIENTE MOTT  
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9 *Attorneys for Plaintiffs*

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11 IN THE FIFTH JUDICIAL DISTRICT COURT  
12 IN AND FOR THE COUNTY OF NYE, STATE OF NEVADA

13

14 IGNACIO GONZALES ORTIZ, an individual;  
and ADELINA CHAPARRO, an individual,

Case No.: CV21-0743  
Dept. No.: 1

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Plaintiffs,

17

v.

INITIAL APPEARANCE AND FEE  
DISCLOSURE (NRS CHAPTER 19)

18

DAVID JOHN LYNCH, an individual;  
SYSTEM TRANSPORT, INC., a foreign  
corporation; DOE INDIVIDUALS  
I through X; and ROE ENTITIES  
I through X, Inclusive,

21

Defendants.

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Pursuant to NRCP Chapter 19, as amended by Senate Bill 106, filing fees are submitted  
for parties appearing in the above-entitled action as indicated below:

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1 Plaintiff, IGNACIO GONZALES ORTIZ \$245.00  
2 Plaintiff, ADELINA CHAPARRO \$ 30.00  
3 Total Remitted: \$275.00  
4  
5 Dated this 7<sup>th</sup> day of December 2021.

6 VALIENTE MOTT, LTD.  
7  
8  
9 JAMES A. TRUMMELL, ESQ.  
10 Nevada Bar No. 14127  
11 MICHAEL VALIENTE, ESQ.  
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13 *Attorneys for Plaintiffs*  
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IN THE FIFTH JUDICIAL DISTRICT COURT

**IN AND FOR THE COUNTY OF NYE, STATE OF NEVADA**

IGNACIO GONZALES ORTIZ, an individual;  
and ADELINA CHAPARRO, an individual,

Case No.: CV21-0743  
Dept. No.: 1

**Plaintiffs,**

v.

## SUMMONS

DAVID JOHN LYNCH, an individual;  
SYSTEM TRANSPORT, INC., a foreign  
corporation; DOE INDIVIDUALS  
I through X; and ROE ENTITIES  
I through X, Inclusive.

#### Defendants.

## SUMMONS – CIVIL

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ THE INFORMATION BELOW.**

**TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff against you for the relief set forth in the Complaint.

## SYSTEM TRANSPORT, INC.